

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Steven M. Larimore  
Court Administrator \* Clerk of Court

299 East Broward Boulevard  
Fort Lauderdale, Florida 33301  
(954)769-5403

January 24, 2008

PHILIP BURTON  
UNITED STATES COURTHOUSE  
16<sup>TH</sup> FLOOR  
450 GOLDEN GATE AVENUE  
SAN FRANCISCO, CA 94102-3434  
415-522-2000  
IN RE: USA vs. RANDY W. GOLDBERG  
Our Case No: 08-6014-SNOW  
Your Case No: CR-07-00788-07-JF

FILED  
JAN 29 2008  
CLERK OF DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE, FLORIDA

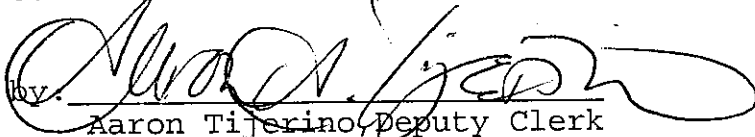
Dear Fellow Clerk:

Please find enclosed our original Magistrate file and a copy of the docket sheet which is being transferred to your jurisdiction pursuant to an Order of Removal (Rule 40). Any cash bond which may have been posted will be forwarded at a later date from the Financial Section of this District.

Please acknowledge receipt on the copy of this letter.

Respectfully,

STEVEN M. LARIMORE  
COURT ADMINISTRATOR/CLERK OF COURT

by:   
Aaron Tijerino, Deputy Clerk

Receipt acknowledged by: \_\_\_\_\_

Print Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

CLOSED, LSS

**U.S. District Court  
Southern District of Florida (Ft. Lauderdale)  
CRIMINAL DOCKET FOR CASE #: 0:08-mj-06014-LSS-ALL  
Internal Use Only**

Case title: USA v. Goldberg

Date Filed: 01/17/2008

Assigned to: Magistrate Judge Lurana  
S. Snow

**Defendant**

**Randy W. Goldberg (1)**  
DOB \*1970\* USMS 77541-004

represented by **Steven Elliot Chaykin**  
Akerman Senterfitt  
One Southeast Third Avenue  
28th Floor  
Miami, FL 33131  
305-982-5665  
Fax: 305-374-5095  
Email: steven.chaykin@akerman.com  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**  
*Designation: Temporary*

**Pending Counts**

None

**Highest Offense Level (Opening)**

None

**Terminated Counts**

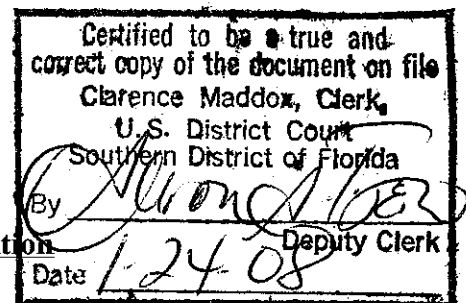
None

**Highest Offense Level (Terminated)**

None

**Complaints**

18:371.F CONSPIRACY TO  
DEFRAUD THE UNITED STATES

**Disposition****Disposition****Plaintiff**

USA

represented by **Robin Waugh-Farretta**

United States Attorney's Office

500 E Broward Boulevard

7th Floor









Fort Lauderdale, FL 33301-3002






954-660-5692

Fax: 356-7336

Email: robin.waugh@usdoj.gov

**LEAD ATTORNEY****ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
01/17/2008	 <u>1</u>	REMOVAL OF INDICTMENT FROM OTHER DISTRICT (ND/CA) as to Randy W. Goldberg (1). (at) Modified on 1/17/2008 (at). (Entered: 01/17/2008)
01/17/2008	 <u>2</u>	Report Commencing Criminal Action as to Randy W. Goldberg - DOB: **/**/*1970* Prisoner #: 77541-004 (at) (Entered: 01/17/2008)
01/17/2008	 <u>3</u>	Order on Initial Appearance as to Randy W. Goldberg for proceeding held on 1/17/2008 Removal Hearing set for 1/18/2008 01:00 PM in Fort Lauderdale Division before Magistrate Judge Lurana S. Snow. Report Re: Counsel Hearing set for 1/18/2008 01:00 PM in Fort Lauderdale Division before Magistrate Judge Lurana S. Snow. (Signed by Magistrate Judge Lurana S. Snow on 1/17/08.) (at) (Entered: 01/17/2008)
01/17/2008	 <u>4</u>	Minute Entry for proceedings held before Judge Lurana S. Snow :Initial Appearance in Rule 5(c)(3) Proceedings as to Randy W. Goldberg held on 1/17/2008. Deft advised of charges. (Tape #LSS-08-003-1400-1600/2200-2283.) (at) (Entered: 01/17/2008)
01/17/2008	 <u>5</u>	Arrest of Randy W. Goldberg (at) (Entered: 01/17/2008)
01/18/2008	 <u>5</u>	Minute Entry for proceedings held before Judge Lurana S. Snow :Report Re: Counsel Hearing as to Randy W. Goldberg held on 1/18/2008, Detention Hearing as to Randy W. Goldberg held on 1/18/2008. PTD AND REMOVAL HEARINGS SET FOR 1/23/08 @ 10:30 AM BEFORE JUDGE ROSENBAUM (Tape #LSS-08-003-2563-2980.) (at) (Entered: 01/18/2008)
01/23/2008	 <u>6</u>	Minute Entry for proceedings held before Judge Robin S. Rosenbaum :Detention Hearing as to Randy W. Goldberg NOT held on 1/23/2008, Removal Hearing as to Randy W. Goldberg NOT held on 1/23/2008. Removal hearing not held, deft files waiver of hearing, PTD not held, parties agreed to bonds. \$1 Million PSB with three cosignors and a \$300,000 10% cash bond. All conditions met and deft released today. Deft to report to ND of CA on 2/6/08 at 9:30 a.m. before Judge Tumble and @ 10:00 a.m. before Judge Fogel. (Tape #RSR-08-002-424-673.) (at) (Entered: 01/24/2008)
01/23/2008	 <u>7</u>	\$300,000 10% PSB Bond Entered as to Randy W. Goldberg Receipt #

		220749. Approved by Judge Robin S. Rosenbaum Special Conditions: Surrender all passports and travel documents to the Pretrial Services Office; Report to Pretrial Services as directed; Submit to substance abuse testing and/or treatment as directed by Pretrial Services; Refrain from excessive use of alcohol, or any use of a narcotic drug or other controlled substance; Maintain or actively seek full-time employment; Avoid all contact with victims of or witnesses to the crimes charged, except through counsel; Refrain from possessing a firearm, destructive device or other dangerous weapons; Home Confinement Program; May travel to and from location and must notify Pretrial Services of travel plans before leaving and upon return.; Comply with additional conditions of bond; ***Please refer to bond for conditions of release ***** (at) (Entered: 01/24/2008)
01/23/2008	 <u>8</u>	\$1,000,000 PSB Bond Entered as to Randy W. Goldberg Approved by Judge Robin S. Rosenbaum Special Conditions: Surrender all passports and travel documents to the Pretrial Services Office; Report to Pretrial Services as directed; Submit to substance abuse testing and/or treatment as directed by Pretrial Services; Refrain from excessive use of alcohol, or any use of a narcotic drug or other controlled substance; Maintain or actively seek full-time employment; Avoid all contact with victims of or witnesses to the crimes charged, except through counsel; Refrain from possessing a firearm, destructive device or other dangerous weapons; Home Confinement Program; May travel to and from location and must notify Pretrial Services of travel plans before leaving and upon return.; Comply with additional conditions of bond; *** Please refer to bond for conditions of release **** (at) (Entered: 01/24/2008)
01/23/2008	 <u>9</u>	ORDER OF REMOVAL as to Randy W. Goldberg (Signed by Magistrate Judge Robin S. Rosenbaum on 1/23/08.) (at) (Entered: 01/24/2008)
01/23/2008	 <u>10</u>	NOTICE OF TEMPORARY ATTORNEY APPEARANCE: Steven Elliot Chaykin appearing for Randy W. Goldberg (at) (Entered: 01/24/2008)
01/23/2008	 <u>11</u>	WAIVER OF REMOVAL HEARING of Rule 5(c)(3) Hearing by Randy W. Goldberg (at) (Entered: 01/24/2008)
01/24/2008	 <u>12</u>	Transmittal Letter as to Randy W. Goldberg sent to ND CALIFORNIA with Originals and Certified Copy of Docket Sheet (at) (Entered: 01/24/2008)
01/24/2008		***Set/Clear Flags as to Randy W. Goldberg (at) (Entered: 01/24/2008)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

APPEARANCE BOND: 1 Million PSB

CASE NO.: 08-6014-mj-LSS

UNITED STATES OF AMERICA

Plaintiff,

JAIL # 77541-004

VS

RANDY GOLDBERG

Defendant,

I, the undersigned defendant and I or we, the undersigned sureties, jointly and severally acknowledge that we and our personal representatives, jointly and severally, are bound to pay the United States of America, the sum of **\$1 Million PSB**

STANDARD CONDITIONS OF BOND

The conditions of this bond are that the defendant:

1. Shall appear before this court and at such other places as the defendant may be required to appear, in accordance with any and all orders and directions relating to the defendant's appearance in this case, including appearance for violation of a condition of the defendant's release as may be ordered or notified by this court or any other United States District Court to which the defendant may be held to answer or the cause transferred. The defendant is to abide by any judgment entered in such matter by surrendering to serve any sentence imposed and obeying any order or direction in connection with such judgment. This is a continuing bond, including any proceeding on appeal or review, which shall remain in full force and effect until such time as the court shall order otherwise.

2. May not at any time, for any reason whatever, leave the Southern District of Florida or other District to which the case may be removed or transferred after he or she has appeared in such District pursuant to the conditions of this bond, without first obtaining written permission from the court, except that a defendant ordered removed or transferred to another district may travel to that district as required for court appearances and trial preparation upon written notice to the Clerk of this court or the court to which the case has been removed or transferred. The Southern District of Florida consists of the following counties: **Monroe, Miami-Dade, Broward, Palm Beach, Martin, St. Lucie, Indian River, Okeechobee, and Highlands.**

3. May not change his or her present address as recorded on page 5 of this bond without prior permission in writing from the court.

4. Is required to appear in court at all times as required by notice given by the court or its clerk to the address on this bond or in open court or to the address as changed by permission from the court. The defendant is required to ascertain from the Clerk of Court or defense counsel the time and place of all scheduled proceedings on the case. In no event may a defendant assume that his or her case has been dismissed unless the court has entered an order of dismissal.

5. Shall not commit any act in violation of state or federal laws.

SCANNED

DEFENDANT: Randy GoldbergCASE NUMBER: 08-601-mj-LSS

PAGE TWO

SPECIAL CONDITIONS OF BOND

In addition to compliance with the previously stated conditions of bond, the defendant must comply with the special conditions checked below:

- ☒ a. Surrender all passports and travel documents, if any, to the Pretrial Services Office and not obtain any travel documents during the pendency of the case;
- ☒ b. Report to Pretrial Services as follows: ( ☒ ) as directed & 1 wk times in person and ☒ times by telephone as directed;
- ☒ c. Submit to substance abuse testing and/or treatment as directed by Pretrial Services;
- ☒ d. Refrain from excessive use of alcohol, or any use of a narcotic drug or other controlled substance, as defined in section 102 of the Controlled Substances Act (21 U.S.C. § 802), without a prescription by a licensed medical practitioner;
- ☐ e. Participate in mental health assessment and/or treatment;
- ☐ f. Participate and undergo a sex offense specific evaluation and treatment;
- ☒ g. Maintain or actively seek full-time employment;
- ☐ h. Maintain or begin an educational program;
- ☒ i. Avoid all contact with victims of or witnesses to the crimes charged, except through counsel;
- ☒ j. Refrain from possessing a firearm, destructive device or other dangerous weapons;
- ☐ k. None of the signatories may sell, pledge, mortgage, hypothecate, encumber, etc., any property they own, real or personal, until the bond is discharged, or otherwise modified by the Court;
- ☐ l. May not visit commercial transportation establishment: airports, seaport/marinas, commercial bus terminals, train stations, etc.;
- ☐ m. No access to the internet via any type of connectivity device (i.e. computers, pda's, cellular phones, tv's), and follow instructions as outlined in the agreement waiver provided to you by Pretrial Services;
- ☒ n. **HOME CONFINEMENT PROGRAM** The defendant shall participate in one of the following home confinement program components and abide by all the requirements of the program which ( ) will not or ( ) will include electronic monitoring or other location verification system, paid for by the defendant based upon his/her ability to pay ( ) or paid for by Pretrial Services ( ).
- ☒ Curfew: You are restricted to your residence every day from 9<sup>30</sup> PM to 7<sup>30</sup> AM or as directed by the Court. Exception of attendance of Gamblers Anonymous.
- ☐ Home Detention: You are restricted to your residence at all times except for: ( ) medical needs or treatment, ( ) court appearances, ( ) attorney visits or court ordered obligations, and ( ) other \_\_\_\_\_.
- ☐ o. **HALFWAY HOUSE PLACEMENT** The defendant shall reside at a halfway house or community corrections center and abide by all the rules and regulations of the program.
- You are restricted to the halfway house at all times except for: ( ) employment; ( ) education; ( ) religious services; ( ) medical, substance abuse, or mental health treatment; ( ) attorney visits; ( ) court appearances; ( ) court ordered obligations; ( ) reporting to Pretrial Services; and ( ) other \_\_\_\_\_.
- ☒ p. May travel to and from: SDFL to DD of Cal, and must notify Pretrial Services of travel plans before leaving and upon return.
- ☒ q. Comply with the following additional conditions of bond:  
attend Gamblers Anonymous once a week  
and to go straight home post-afterwards  
to appear at 108 before Judge Trumbull  
@ 9<sup>30</sup> AM



DEFENDANT: Randy Goldberg  
CASE #: 08-6014-mj-LSS  
PAGE THREE

**PENALTIES AND SANCTIONS APPLICABLE TO DEFENDANT**

Violation of any of the foregoing conditions of release may result in the immediate issuance of a warrant for the defendant's arrest, a revocation of release, an order of detention, as provided in 18 U.S.C. § 3148, forfeiture of any bail posted, and a prosecution for contempt as provided in 18 U.S.C. § 401, which could result in a possible term of imprisonment or a fine.

The commission of any offense while on pretrial release may result in an additional sentence upon conviction for such offense to a term of imprisonment of not more than ten years, if the offense is a felony; or a term of imprisonment of not more than one year, if the offense is a misdemeanor. This sentence shall be consecutive to any other sentence and must be imposed in addition to the sentence received for the offense itself.

Title 18 U.S.C. § 1503 makes it a criminal offense punishable by up to five years of imprisonment and a \$250,000 fine to intimidate or attempt to intimidate a witness, juror or officer of the court; 18 U.S.C. § 1510 makes it a criminal offense punishable by up to five years of imprisonment and a \$250,000 fine to obstruct a criminal investigation; 18 U.S.C. § 1512 makes it a criminal offense punishable by up to ten years of imprisonment and a \$250,000 fine to tamper with a witness, victim or informant; and 18 U.S.C. § 1513 makes it a criminal offense punishable by up to ten years of imprisonment and a \$250,000 fine to retaliate against a witness, victim or informant, or threaten to do so.

It is a criminal offense under 18 U.S.C. § 3146, if after having been released, the defendant knowingly fails to appear as required by the conditions of release, or to surrender for the service of sentence pursuant to a court order. If the defendant was released in connection with a charge of, or while awaiting sentence, surrender for the service of a sentence, or appeal or certiorari after conviction for:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more the defendant shall be fined not more than \$250,000 or imprisoned for not more than ten years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years, the defendant shall be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony, the defendant shall be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor, the defendant shall be fined not more than \$100,000 or imprisoned not more than one year, or both.
- (5) A term of imprisonment imposed for failure to appear or surrender shall be consecutive to the sentence of imprisonment for any other offense. In addition, a failure to appear may result in the forfeiture of any bail posted, which means that the defendant will be obligated to pay the full amount of the bond, which may be enforced by all applicable laws of the United States.

DEFENDANT: RANDY GOLDBERG  
CASE NUMBER: 08-6014-mj-LSS

PAGE FOUR

**PENALTIES AND SANCTIONS APPLICABLE TO SURETIES**

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

**SIGNATURES**

I have carefully read and I understand this entire appearance bond consisting of four pages, or it as been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

Signed this 22 day of JANUARY, 2007, at Ft Lauderdale, Florida.  
Signed and acknowledged before me: DEFENDANT: (Signature) Randy Goldberg  
WITNESS: [Signature]  
city FT. LAUDERDALE state FLORIDA

**CORPORATE SURETY**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007, at \_\_\_\_\_, Florida.  
SURETY: \_\_\_\_\_ AGENT: (Signature) \_\_\_\_\_  
city \_\_\_\_\_ state \_\_\_\_\_ PRINT NAME: \_\_\_\_\_

**INDIVIDUAL SURETIES**

① Signed this 23 day of Jan, 2007, at Ft. Lauderdale, Florida.  
SURETY: (Signature) [Signature]  
PRINT NAME: Randy Goldberg  
RELATIONSHIP TO DEFENDANT: wife  
ADDRESS: 3426 NE 168 St  
NMB, FL 33160  
TELEPHONE: 305 945 7144

② Signed this 23 day of Jan, 2007, at Ft. Lauderdale, Florida.  
SURETY: (Signature) [Signature]  
PRINT NAME: Abbie Goldberg  
RELATIONSHIP TO DEFENDANT: brother  
ADDRESS: 987 Captiva Dr  
Hollywood, FL 33019  
TELEPHONE: 954 456 4304

**APPROVAL BY COURT**

Date: 1-23-08

[Signature]  
ROBIN S. ROSENBAUM  
UNITED STATES MAGISTRATE JUDGE

DISTRIBUTION: Defendant, Assistant U.S. Attorney, Counsel, U.S. Marshal, Pretrial Services



DO NOT SCAN THIS PAGE

DEFENDANT: Randy Goldberg  
CASE NUMBER: 08-6014-mj-LSS

PAGE FIVE

**PENALTIES AND SANCTIONS APPLICABLE TO SURETIES**

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

**SIGNATURES**

I have carefully read and I understand this entire appearance bond consisting of four pages, or it as been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

Signed this 23 day of February, 2007 at Fort Lauderdale, Florida.  
Signed and acknowledged before me: DEFENDANT: (Signature) Randy Goldberg  
WITNESS: ADDRESS: 3426 NE 165th St  
ADDRESS: N. Miami Beach FL ZIP 33160  
TELEPHONE: 305 945-7144

**CORPORATE SURETY**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007, at \_\_\_\_\_, Florida.  
SURETY: AGENT: (Signature) \_\_\_\_\_  
ADDRESS: PRINT NAME: \_\_\_\_\_  
TELEPHONE: \_\_\_\_\_

**INDIVIDUAL SURETIES**

③ Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007, at \_\_\_\_\_, Florida. Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007 at \_\_\_\_\_, Florida.  
SURETY: (Signature) Sarah Stevens SURETY: (Signature) \_\_\_\_\_  
PRINT NAME: SARAH STEVENS PRINT NAME: \_\_\_\_\_  
RELATIONSHIP TO DEFENDANT: MOTHER RELATIONSHIP TO DEFENDANT: \_\_\_\_\_  
ADDRESS: 3188 NE 307 TERR ADDRESS: \_\_\_\_\_  
AVENUE PL ZIP 33180 ZIP \_\_\_\_\_  
TELEPHONE: 305-933-1343 TELEPHONE: \_\_\_\_\_


**STIPULATION AS ADDITIONAL CONDITION TO  
PERSONAL SURETY BOND OF \$1,000,000 ON BEHALF  
OF RANDY GOLDBERG**

As an additional condition to the \$1,000,000 Personal Surety Bond Randy Goldberg, Defendant Randy Goldberg's wife, is executing on behalf of the Defendant Randy Goldberg, Randy Goldberg stipulates and agrees as follows:

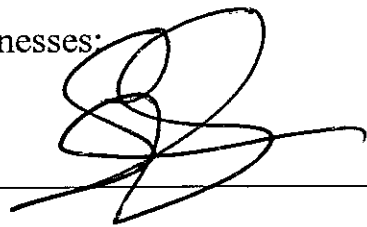
With respect to her home located at 3426 N.E. 168<sup>th</sup> St, North Miami Beach, Fl, Randy Goldberg agrees: not to sell, transfer, assign, pledge, encumber, borrow against or mortgage any portion of her 100% interest in said property. Further, she agrees to maintain the property and take no action which would either diminish or impair the value of the property.

This condition and agreement by Randy Goldberg shall be incorporated as a condition of said bond and continue as condition of the personal surety bond until such time as the bond is discharged or otherwise ordered by the Court.

AGREED to this 23<sup>rd</sup> day of January, 2008, in open Court before the Honorable Robin Rosenbaum, United States Magistrate Judge for Southern District of Florida.

  
\_\_\_\_\_  
Randi Goldberg

Witnesses:

  
\_\_\_\_\_  
\_\_\_\_\_

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

APPEARANCE BOND: 300,000 w/10% Cash

CASE NO.: 08-6014-mj-LSS

JAIL # 77541-004

UNITED STATES OF AMERICA  
Plaintiff,

VS

RANDY GOLDBERG

Defendant,

I, the undersigned defendant and I or we, the undersigned sureties, jointly and severally acknowledge that we and our personal representatives, jointly and severally, are bound to pay the United States of America, the sum of **\$300,000 W/10% Cash**

STANDARD CONDITIONS OF BOND

The conditions of this bond are that the defendant:

1. Shall appear before this court and at such other places as the defendant may be required to appear, in accordance with any and all orders and directions relating to the defendant's appearance in this case, including appearance for violation of a condition of the defendant's release as may be ordered or notified by this court or any other United States District Court to which the defendant may be held to answer or the cause transferred. The defendant is to abide by any judgment entered in such matter by surrendering to serve any sentence imposed and obeying any order or direction in connection with such judgment. This is a continuing bond, including any proceeding on appeal or review, which shall remain in full force and effect until such time as the court shall order otherwise.
2. May not at any time, for any reason whatever, leave the Southern District of Florida or other District to which the case may be removed or transferred after he or she has appeared in such District pursuant to the conditions of this bond, without first obtaining written permission from the court, except that a defendant ordered removed or transferred to another district may travel to that district as required for court appearances and trial preparation upon written notice to the Clerk of this court or the court to which the case has been removed or transferred. The Southern District of Florida consists of the following counties: **Monroe, Miami-Dade, Broward, Palm Beach, Martin, St. Lucie, Indian River, Okeechobee, and Highlands.**
3. May not change his or her present address as recorded on page 5 of this bond without prior permission in writing from the court.
4. Is required to appear in court at all times as required by notice given by the court or its clerk to the address on this bond or in open court or to the address as changed by permission from the court. The defendant is required to ascertain from the Clerk of Court or defense counsel the time and place of all scheduled proceedings on the case. In no event may a defendant assume that his or her case has been dismissed unless the court has entered an order of dismissal.
5. Shall not commit any act in violation of state or federal laws.

SCANNED

DEFENDANT: Randy Goldberg

CASE NUMBER: 08-601-mj-LSS

PAGE TWO

SPECIAL CONDITIONS OF BOND

In addition to compliance with the previously stated conditions of bond, the defendant must comply with the special conditions checked below:

- ☒ a. Surrender all passports and travel documents, if any, to the Pretrial Services Office and not obtain any travel documents during the pendency of the case;
- ☒ b. Report to Pretrial Services as follows: ( ) as directed or 1 <sup>time</sup> times in person and ✓ times by telephone as directed
- ☒ c. Submit to substance abuse testing and/or treatment as directed by Pretrial Services;
- ☒ d. Refrain from excessive use of alcohol, or any use of a narcotic drug or other controlled substance, as defined in section 102 of the Controlled Substances Act (21 U.S.C. § 802), without a prescription by a licensed medical practitioner;
- ☐ e. Participate in mental health assessment and/or treatment;
- ☐ f. Participate and undergo a sex offense specific evaluation and treatment;
- ☒ g. Maintain or actively seek full-time employment;
- ☐ h. Maintain or begin an educational program;
- ☒ i. Avoid all contact with victims of or witnesses to the crimes charged, except through counsel;
- ☒ j. Refrain from possessing a firearm, destructive device or other dangerous weapons;
- ☐ k. None of the signatories may sell, pledge, mortgage, hypothecate, encumber, etc., any property they own, real or personal, until the bond is discharged, or otherwise modified by the Court;
- ☐ l. May not visit commercial transportation establishment: airports, seaport/marinas, commercial bus terminals, train stations, etc.;
- ☐ m. No access to the internet via any type of connectivity device (i.e. computers, pda's, cellular phones, tv's), and follow instructions as outlined in the agreement waiver provided to you by Pretrial Services;
- ☒ n. **HOME CONFINEMENT PROGRAM** The defendant shall participate in one of the following home confinement program components and abide by all the requirements of the program which ( ) will not or ( ) will include electronic monitoring or other location verification system, paid for by the defendant based upon his/her ability to pay ( ) or paid for by Pretrial Services ( ).
  - ☒ **Curfew:** You are restricted to your residence every day from 9<sup>30</sup> pm to 7<sup>30</sup> AM, or as directed by the Court. Exception of attendance of Gambles Anonymous
  - ☐ **Home Detention:** You are restricted to your residence at all times except for: ( ) medical needs or treatment, ( ) court appearances, ( ) attorney visits or court ordered obligations, and ( ) other \_\_\_\_\_.
- ☐ o. **HALFWAY HOUSE PLACEMENT** The defendant shall reside at a halfway house or community corrections center and abide by all the rules and regulations of the program.
 

You are restricted to the halfway house at all times except for: ( ) employment; ( ) education; ( ) religious services; ( ) medical, substance abuse, or mental health treatment; ( ) attorney visits; ( ) court appearances; ( ) court ordered obligations; ( ) reporting to Pretrial Services; and ( ) other \_\_\_\_\_.
- ☒ p. May travel to and from: DD of California and must notify Pretrial Services of travel plans before leaving and upon return.
- ☒ q. Comply with the following additional conditions of bond: attend Gambles Anonymous 1 wk

appear 2/6/08 before Judge Turnbull @ 9:30 AM

DEFENDANT: Randy Goldberg  
CASE #: 08-6014-mj-LSS  
PAGE THREE

**PENALTIES AND SANCTIONS APPLICABLE TO DEFENDANT**

Violation of any of the foregoing conditions of release may result in the immediate issuance of a warrant for the defendant's arrest, a revocation of release, an order of detention, as provided in 18 U.S.C. § 3148, forfeiture of any bail posted, and a prosecution for contempt as provided in 18 U.S.C. § 401, which could result in a possible term of imprisonment or a fine.

The commission of any offense while on pretrial release may result in an additional sentence upon conviction for such offense to a term of imprisonment of not more than ten years, if the offense is a felony; or a term of imprisonment of not more than one year, if the offense is a misdemeanor. This sentence shall be consecutive to any other sentence and must be imposed in addition to the sentence received for the offense itself.

Title 18 U.S.C. § 1503 makes it a criminal offense punishable by up to five years of imprisonment and a \$250,000 fine to intimidate or attempt to intimidate a witness, juror or officer of the court; 18 U.S.C. § 1510 makes it a criminal offense punishable by up to five years of imprisonment and a \$250,000 fine to obstruct a criminal investigation; 18 U.S.C. § 1512 makes it a criminal offense punishable by up to ten years of imprisonment and a \$250,000 fine to tamper with a witness, victim or informant; and 18 U.S.C. § 1513 makes it a criminal offense punishable by up to ten years of imprisonment and a \$250,000 fine to retaliate against a witness, victim or informant, or threaten to do so.

It is a criminal offense under 18 U.S.C. § 3146, if after having been released, the defendant knowingly fails to appear as required by the conditions of release, or to surrender for the service of sentence pursuant to a court order. If the defendant was released in connection with a charge of, or while awaiting sentence, surrender for the service of a sentence, or appeal or certiorari after conviction for:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more the defendant shall be fined not more than \$250,000 or imprisoned for not more than ten years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years, the defendant shall be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony, the defendant shall be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor, the defendant shall be fined not more than \$100,000 or imprisoned not more than one year, or both.
- (5) A term of imprisonment imposed for failure to appear or surrender shall be consecutive to the sentence of imprisonment for any other offense. In addition, a failure to appear may result in the forfeiture of any bail posted, which means that the defendant will be obligated to pay the full amount of the bond, which may be enforced by all applicable laws of the United States.

DEFENDANT: RANDY GOLDBERG  
CASE NUMBER: 08-6014-mj-LSS

PAGE FOUR

**PENALTIES AND SANCTIONS APPLICABLE TO SURETIES**

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

**SIGNATURES**

I have carefully read and I understand this entire appearance bond consisting of four pages, or it as been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

**DEFENDANT**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007, at \_\_\_\_\_, Florida.

Signed and acknowledged before me:

DEFENDANT:(Signature) Randy Goldberg

WITNESS: \_\_\_\_\_

D. Miami Beach

city

state

city

state

**CORPORATE SURETY**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007, at \_\_\_\_\_, Florida.

SURETY: \_\_\_\_\_

AGENT:(Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

city

state

**INDIVIDUAL SURETIES**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007, at \_\_\_\_\_, Florida.

SURETY:(Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO

DEFENDANT: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

TELEPHONE: \_\_\_\_\_

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007, at \_\_\_\_\_, Florida.

SURETY:(Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO

DEFENDANT: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

TELEPHONE: \_\_\_\_\_

**APPROVAL BY COURT**

Date: 1-23-08

Robert S. Rosenbaum  
ROBIN S. ROSENBAUM  
UNITED STATES MAGISTRATE JUDGE

DISTRIBUTION: Defendant, Assistant U.S. Attorney, Counsel, U.S. Marshal, Pretrial Services



Bank of America

Cashier's Check

No. 6025144

Notice to Purchaser: In the event this check is lost, misplaced or stolen, a sworn statement and 90-day waiting period will be required prior to replacement. This check should be negotiated within 90 days.

Date JANUARY 23, 2008

30-1/H140  
NTXBanking  
Center

AVENTURA MALL

0109338 00004 006025144

SARAH STEVENS  
Remitter (Purchased By)

\$ \*\*30000.00\*\*

Pay \*\*THIRTY THOUSAND DOLLARS AND 00 CENTS\*\*

To  
The  
Order  
Of \*\*CLERK, UNITED STATES DISTRICT COURT\*\*  
\*\*\*\*

Authorized Signature

Bank of America, N.A.  
San Antonio, Texas

VOID AFTER 90 DAYS

⑈6025144⑈ ⑆114000019⑆ 001641002062⑈

THE ORIGINAL DOCUMENT HAS REFLECTIVE WATERMARK ON THE BACK

AO82  
(Rev. 4/90)

ORIGINAL

220749

RECEIPT FOR PAYMENT  
UNITED STATES DISTRICT COURT  
for the  
SOUTHERN DISTRICT OF FLORIDA  
at FTL

RECEIVED FROM

SARAH STEVENS  
3698 N.E. 207 Terr  
Aventura, FL 33180  
Ph. 305-933-1343

Fund	Deposit Funds
6855XX	Registry Funds
604700	General and Special Funds
508800	Immigration Fees
085000	Attorney Admission Fees
086900	Filing Fees
322340	Sale of Publications
322350	Copy Fees
322360	Miscellaneous Fees
143500	Interest
322380	Recoveries of Court Costs
322386	Restitution to U.S. Government
121000	Conscience Fund
129900	Gifts
504100	Crime Victims Fund
613300	Unclaimed Monies
510000	Civil Filing Fee (1/2)
510100	Registry Fee

ACCOUNT	AMOUNT
604700	30000.00
TOTAL	30000.00
Case Number or Other Reference	08-6014-mj-LSS

Check# 6025144  
USA vs. Randy Goldberg  
10% Cash Bond

Checks and drafts are accepted subject to collection and full credit will only be given when the check or draft has been accepted by the financial institution on which it was drawn.

DATE 1-23-2008 Cash Check M.O. Credit

DEPUTY CLERK:

U. Thomas

D.C.

FILED BY  
2008 JAN 23 AM 11:25CLEARED BY  
S.D. OF FLA-1110

DO NOT SCAN THIS PAGE

DEFENDANT: Randy Goldberg  
CASE NUMBER: 08-6014-mj-LSS

PAGE FIVE

**PENALTIES AND SANCTIONS APPLICABLE TO SURETIES**

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

**SIGNATURES**

I have carefully read and I understand this entire appearance bond consisting of four pages, or it as been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

**DEFENDANT**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007 at \_\_\_\_\_, Florida.

Signed and acknowledged before me:

DEFENDANT:(Signature) Randy Goldberg

WITNESS: \_\_\_\_\_

ADDRESS: 3426 NE 168th St

ADDRESS: \_\_\_\_\_

D. M. K. BEACH, FL ZIP 33166

ZIP \_\_\_\_\_

TELEPHONE: 305-945-7144**CORPORATE SURETY**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007, at \_\_\_\_\_, Florida.

SURETY: \_\_\_\_\_

AGENT:(Signature) \_\_\_\_\_

ADDRESS: \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

ZIP \_\_\_\_\_

TELEPHONE: \_\_\_\_\_

**INDIVIDUAL SURETIES**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007, at \_\_\_\_\_, Florida. Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2007 at \_\_\_\_\_, Florida.

SURETY:(Signature) \_\_\_\_\_

SURETY:(Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO \_\_\_\_\_

RELATIONSHIP TO \_\_\_\_\_

DEFENDANT: \_\_\_\_\_

DEFENDANT: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

ZIP \_\_\_\_\_

ZIP \_\_\_\_\_

TELEPHONE: \_\_\_\_\_

TELEPHONE: \_\_\_\_\_

## COURT MINUTES

## U.S. MAGISTRATE JUDGE ROBIN S. ROSENBAUM- FORT LAUDERDALE, FLORIDA

DEFT: Randy Goldberg (J)# 77541-004 CASE NO: 08-MJ-6014-LSS  
 AUSA: Rogin Waugh-Farretta ATTY: Steven Chaykin-- Temp Notice Entered today  
 AGENT: \_\_\_\_\_ VIOL: 18:371  
 PROCEEDING: Pretrial Detention/Removal Hearing RECOMMENDED BOND: \_\_\_\_\_  
 BOND HEARING HELD - yes / no COUNSEL APPOINTED: \_\_\_\_\_  
 BOND SET @: \_\_\_\_\_ To be cosigned by: \_\_\_\_\_

Removal hearing not held; dft. Files waiver of hearing; PTD not held; parties agree to two bonds. \$1million PSB w/ three co-signors and a \$300,000 w/10% cash bond. All conditions met and dft released today. Deft.to report to ND of California on 2/6/08 @9:30 am before Judge Tumble and @ 10:00 am before Judge Fogel.

- ☐ Do not violate any law.
- ☐ Appear in court as directed.
- ☐ Surrender and / or do not obtain passports / travel documents.
- ☐ Rpt to PTS as directed / or \_\_\_\_\_ x's a week/month by phone; \_\_\_\_\_ x's a week/month in person.
- ☐ Random urine testing by Pretrial Services. \_\_\_\_\_ Treatment as deemed necessary.
- ☐ Maintain or seek full - time employment.
- ☐ No contact with victims / witnesses.
- ☐ No firearms.
- ☐ Curfew: \_\_\_\_\_
- ☐ Travel extended to: \_\_\_\_\_
- ☐ Halfway House \_\_\_\_\_

NEXT COURT APPEARANCE: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_ JUDGE: \_\_\_\_\_ PLACE: \_\_\_\_\_

INQUIRY RE COUNSEL: \_\_\_\_\_

PTD/BOND HEARING: \_\_\_\_\_

PRELIM/ARRAIGN. OR REMOVAL: \_\_\_\_\_

STATUS CONFERENCE: \_\_\_\_\_

DATE 1/23/08 TIME: 10:30 FTL/RSR TAPE # 08- 002 Begin: 424 End: 673

**SCANNED**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-6014-mj-RSR

ORDER OF REMOVAL

UNITED STATES OF AMERICA

VS

RANDY GOLDBERG (B)

It appearing that in the Northern District of California an Indictment was filed against the above-named defendant on a charge of 18:371;18:1343;18:1956 and 18:1956 (a) Conspiracy to commit wire fraud and money laundering, that the defendant was arrested in the Southern District of Florida and was given a hearing before a United States Magistrate Judge Robin S. Rosenbaum at Fort Lauderdale, Florida, which official committed the defendant for removal to the Northern District of California, it is

ORDERED AND ADJUDGED that the defendant be removed to the above-named district for trial on said charge.

And it further appearing that the defendant waived further hearing in the said removal proceedings and was held by the Magistrate Judge for removal and posted bail in the amount of \$ 1 Million PSB w/ three co-signors and a \$300,000 w/ 10% cash which was approved by the United States Magistrate Judge, and it is further

ORDERED that the defendant shall appear in the aforesaid district at such times and places as may be ordered by that District Court, in accordance with the terms and conditions of aforesaid bail bond furnished by the defendant, and it is further

ORDERED that the funds, plus interest, which may have been deposited on behalf of this defendant with the Clerk of the Court under Bail Reform Act be transferred to the district where removed.

DONE AND ORDERED at Fort Lauderdale, Florida, this 23rd day of January, 2008.

  
ROBIN S. ROSENBAUM  
UNITED STATES MAGISTRATE JUDGE

cc: Miami, Financial,USMS

**SCANNED**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA, :

v. :

RANDY W. Goldberg :

CASE NO

08-6014-MJ-AS

NOTICE OF TEMPORARY  
APPEARANCE AS COUNSEL

COMES NOW

STEVEN E. CHAYKIN

and

files this temporary appearance as counsel for the above named defendant(s) at initial appearance. This appearance is made with the understanding that the undersigned counsel will fulfill any obligations imposed by the Court such as preparing and filing documents necessary to collateralize any personal surety bond which may be set.

Counsel's Name (Printed)

STEVEN E. CHAYKIN

Counsel's Signature



Address

ONE S.E. 3<sup>rd</sup> AVE, 25<sup>th</sup> FLOOR

MIAMI FL

Zip Code:

33131

Telephone

305-374-5600

**SCANNED**

UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF FLORIDA

Case No: 08-6014-LSS

United States of America

v

WAIVER OF REMOVAL HEARING

RANDY W. GOLDBERG

I, RANDY W. GOLDBERG, charged in a proceeding pending in the NORTHERN  
District of CALIFORNIA with violation of 18 USC 371, 1343, 1951 and having been  
arrested in the Southern District of Florida and taken before Robin S. Rosenbaum, a United  
States Magistrate Judge for that district, who informed me of the charge and of my right to retain  
counsel or request the assignment of counsel if I am unable to retain counsel, and to have a  
hearing or execute a waiver thereof, do hereby waive a hearing before the aforementioned  
magistrate judge and consent to the issuance of a warrant for my removal to  
the NORTHERN District of CALIFORNIA where the aforesaid charge is pending  
against me.

1/22, 2007

Randy Goldberg  
Signature of Defendant

Robin S. Rosenbaum  
ROBIN S. ROSENBAUM  
UNITED STATES MAGISTRATE JUDGE

SCANNED



## COURT MINUTES

**U.S. MAGISTRATE JUDGE LURANA S. SNOW - FT. LAUDERDALE, FLORIDA**  
(LSS in KW via video conference)

DEFT: RANDY GOLDBERG (J)# 77541-004 CASE NO: 08-6014-LSS  
 AUSA: Robin Waugh Faretta *present* ATTY: Jonathan Goodman (temp) *present*  
 AGENT: \_\_\_\_\_ VIOL: \_\_\_\_\_  
 PROCEEDING: INQUIRY RE COUNSEL/ STATUS RE RECOMMENDED BOND: \_\_\_\_\_  
PTD/REMOVAL DATE  
 BOND HEARING HELD - yes / no COUNSEL APPOINTED: \_\_\_\_\_  
 BOND SET @: \_\_\_\_\_ To be cosigned by: \_\_\_\_\_

- ☐ Do not go by any marina or on any boat
- ☐ \_\_\_\_\_
- ☐ Surrender and / or do not obtain passports / travel documents.
- ☐ Rpt to PTS as directed / or \_\_\_\_\_ x's a week/month by phone; \_\_\_\_\_ x's a week/month in person.
- ☐ \_\_\_\_\_
- ☐ \_\_\_\_\_
- ☐ \_\_\_\_\_
- ☐ \_\_\_\_\_
- ☐ Curfew: \_\_\_\_\_
- ☐ Travel extended to: \_\_\_\_\_
- ☐ \_\_\_\_\_

NEXT COURT APPEARANCE:	DATE:	TIME:	JUDGE:	PLACE:
------------------------	-------	-------	--------	--------

INQUIRY RE COUNSEL: \_\_\_\_\_

PTD/BOND HEARING: \_\_\_\_\_

PRELIM/ARRAIGN. OR REMOVAL: \_\_\_\_\_

DATE: 1-18-08 TIME: 1:00pm FTL/LSS TAPE 08 - 0B3 Begin: 2563 End: 2803

**SCANNED**

## COURT MINUTES

## U.S. MAGISTRATE JUDGE LURANA S. SNOW - FORT LAUDERDALE, FLORIDA

DEFT: RANDY GOLDBERG (D)# 77541-004 CASE NO: 08-6014-LSS  
 AUSA: Robin Waugh Faretta / present ATTY: Jonathan Goodman  
 AGENT: VIOL: REMOVAL:ND/CA (extortion, wire fraud)  
 PROCEEDING: INITIAL APPEARANCE RECOMMENDED BOND: PTD  
 BOND HEARING HELD - yes / no COUNSEL APPOINTED: \_\_\_\_\_  
 BOND SET @: \_\_\_\_\_ To be cosigned by: \_\_\_\_\_

- ☐ Do not violate any law.
- ☐ Appear in court as directed.
- ☐ Surrender and / or do not obtain passports / travel documents.
- ☐ Rpt to PTS as directed / or \_\_\_\_\_ x's a week/month by phone; \_\_\_\_\_ x's a week/month in person.
- ☐ Random urine testing by Pretrial Services. \_\_\_\_\_ Treatment as deemed necessary.
- ☐ Maintain or seek full - time employment.
- ☐ No contact with victims / witnesses.
- ☐ No firearms.
- ☐ Curfew: \_\_\_\_\_
- ☐ Travel extended to: \_\_\_\_\_
- ☐ Halfway House \_\_\_\_\_

*Advised of  
Charges*

NEXT COURT APPEARANCE:	DATE:	TIME:	JUDGE:	PLACE:
INQUIRY RE COUNSEL:	1-18-08	1:00pm		✓
PTD/BOND HEARING:	1-18-08	to be set		✓
PRELIM/ARRAIGN. OR REMOVAL:	1-18-08	to be set		
STATUS CONFERENCE:				

DATE: 1-17-08 TIME: 11:00am FTL/LSS TAPE # 08-003 Begin: 1400 End: 16005

*recalled*

08-003  
2200-2283 **SCANNED**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 08-6014-LSS

UNITED STATES OF AMERICA

Plaintiff,

**ORDER ON INITIAL APPEARANCE**

Language English

Tape No. 08-003

AUSA Robin Waugh Faretta

Agent

v.

**RANDY GOLDBERG**

Defendant.

The above-named defendant having been arrested on 1-17-08, having appeared before the court for initial appearance on 1-17-08 and proceedings having been held in accordance with **F.R.C.P. 5 or 40(a)**, it is thereupon

**ORDERED** as follows:

1. Jonathan Goodman appeared as permanent temporary counsel of record.

Address: \_\_\_\_\_

Zip Code: \_\_\_\_\_ Telephone: \_\_\_\_\_ 2.

\_\_\_\_\_ appointed as permanent counsel of record.

Address: \_\_\_\_\_ Zip

Code: \_\_\_\_\_ Telephone: \_\_\_\_\_ 3. The

defendant shall attempt to retain counsel and shall appear before the court at 1-18-08 on 1:00pm before

Judge Snow states re 1-18-08 at 1:00pm before Judge Snow

4. Arraignment/Preliminary is set for 1-18-08 at 1:00pm before Judge Snow

5. The defendant is held in temporary pretrial detention pursuant to 18 U.S.C. Section 3142 (d) or (f) because \_\_\_\_\_ A

detention hearing, pursuant to 18 U.S.C. Section 3142(f), is set for \_\_\_\_\_ at \_\_\_\_\_ before Judge \_\_\_\_\_.

6. The defendant shall be released from custody upon the posting of the following type of appearance bond, pursuant to 18 U.S.C. Section 3142: \_\_\_\_\_ This

bond shall contain the standard conditions of bond printed in the bond form of this Court and, in addition, the defendant must comply with the special conditions checked below:

- ☐ a. Surrender all passports and travel document to the Pretrial Services Office.
- ☐ b. Report to Pretrial Services as follows: \_\_\_\_\_ as directed; \_\_\_\_\_ times a week /month by phone, \_\_\_\_\_ times a week/month \_\_\_\_\_ in person; other: \_\_\_\_\_
- ☐ c. Submit to random urine testing by Pretrial Services for the use of non-physician-prescribed substances prohibited by law.
- ☐ d. Maintain or actively seek full time gainful employment.
- ☐ e. Maintain or begin an educational program.
- ☐ f. Avoid all contact with victims of or witnesses to the crimes charged.
- ☐ g. Refrain from possessing a firearm, destructive device or other dangerous weapon.
- ☐ h. Comply with the following curfew: \_\_\_\_\_
- ☐ i. Avoid all commercial transportation facilities; no airports, no marinas, no bus terminals.

**SCANNED**

j. Comply with the following additional special conditions of this bond: \_\_\_\_\_  
\_\_\_\_\_

bond was set: At Arrest \_\_\_\_\_  
On Warrant \_\_\_\_\_  
After Hearing \_\_\_\_\_

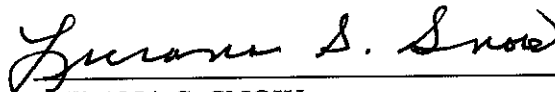
If bond is changed from that set in another District, the reason pursuant to Rule 40(f) is \_\_\_\_\_

\_\_\_\_\_ If this space is checked, an evidentiary hearing pursuant to United States v. Nebbia, 357, F.2d 303 (2 Cir. 1966) shall be held prior to the posting of the bond. Such hearing shall be scheduled promptly upon notification to the court that the defendant is ready to post bond.

7. The defendant has been advised by the court that if he or she is released on bond pursuant to the conditions set forth herein or those later ordered by the court, the defendant is subject to arrest and revocation of release and to various civil and criminal sanctions for any violation of those conditions. These various sanctions and penalties are set forth more fully in the Appearance Bond itself.

8. The defendant is committed to the custody of the United States Marshal until an appearance bond has been executed in accordance with this or subsequent court order.

**DONE AND ORDERED** at Ft. Lauderdale, Florida this 17 day of January, 2008.



LURANA S. SNOW  
UNITED STATES MAGISTRATE

cc: Assistant U.S. Attorney  
Defendant  
Counsel  
Copy for Judge  
Pretrial Services/Probation

United States District Court  
Northern District of California  
**SEALED BY ORDER  
OF COURT**

UNITED STATES OF AMERICA,

v.

**WARRANT FOR ARREST**

Case Number: **CR-07-00788-07-JF**

**Randy W. Goldberg**

To: The United States Marshal  
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest **Randy W. Goldberg**

and bring him or her forthwith to the nearest magistrate judge to answer a(n)

☒ (X) Indictment   ☐ ( ) Information   ☐ ( ) Complaint  
☐ ( ) Order of Court   ☐ ( ) Violation Notice   ☐ ( ) Probation Violation Petition

charging him or her with: See Below

Count 1	18:371 Conspiracy
Counts 7, 12	18:1343 and 2 - Wire Fraud; Aiding and Abetting
Counts 16-23	18:1951 and 2- Extortion; Aiding and Abetting
Count 24	18:1956(h) - Conspiracy to Launder Monetary Instruments

**Cita F. Escolano**

Name of Issuing Officer

*Cita F. Escolano*

Signature of Issuing Officer

Deputy Clerk

Title of Issuing Officer

12/13/07, San Jose, CA

Date and Location

Bail Fixed at \$ **NO BAIL**

by **Patricia V. Trumbull**

Name of Judicial Officer

NORTHERN DISTRICT  
OF CALIFORNIA

2007 DEC 13 PM 2:47

RECEIVED  
UNITED STATES DISTRICT COURT

**RETURN**

This warrant was received and executed with the arrest of the above-named defendant at

ORIGINAL WARRANT HELD BY  
U.S. MARSHALS, SAN JOSE

Date received

Name and Title of Arresting Officer

Date of Arrest

Signature of Arresting Officer

RETURN TO OFFICE UPON ARREST

RETURN ON THIS COPY

No.

CR 07 00788

JF

PVT

Under Seal  
FILED

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEC 13 2007  
CLERK OF DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SEALED BY ORDER  
OF COURT

THE UNITED STATES OF AMERICA

vs.

AMIT M. EZYONI, ASAF NASS a/k/a "Dan", LIMOR GEFEN  
a/k/a "Dana", ELI KAUPP, DANIEL G. RANGEL, BARAK  
BRAUNSHAIN, RANDY W. GOLDBERG, BRANDI C. AYCOCK,  
DAVID R. LAMONDIN, MATTHEW D. SANDOMIR, STUART H.  
SHEINFELD, CAROL HAEUSSLER, CHRISTOPHER A. SARIOL,  
and EDUARDO A. SUBIRATS

INDICTMENT

COUNT ONE:

Title 18, U.S.C. § 371 -  
Conspiracy to Commit Wire  
Fraud and Extortion

COUNTS TWO - FIFTEEN:

Title 18, U.S.C. § 1343 - Wire  
Fraud

COUNTS SIXTEEN - TWENTY-THREE:

Title 18, U.S.C. § 1951 -  
Extortion

COUNT TWENTY-FOUR:

Title 18, U.S.C. § 1956(h) -  
Conspiracy to Commit Money  
Laundering

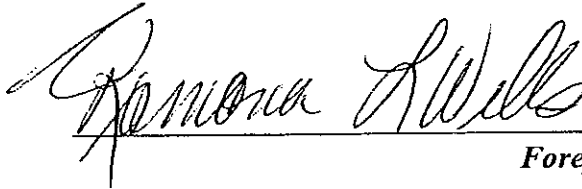
COUNTS TWENTY-FIVE - TWENTY-EIGHT:

Title 18, U.S.C. §  
1956(a)(1)(A)(1) - Money  
Laundering

DOCUMENT NO.	CSA's INITIALS
1	e
DISTRICT COURT CRIMINAL CASE PROCESSING	



A true bill.

  
Foreperson

---

Filed in open court this 12 day of December

A.D. 2007

  
United States Magistrate Judge

---

Bail. \$ Arrest warrants - no bail

Ezyone

Naso

Meyer

Holding

aycock

Kaupp

Rangel

Braunshstein

no process for all other  
defendants

PV7

1 SCOTT N. SCHOOLS (SCN 9990)  
2 United States Attorney

SEALED BY ORDER  
OF COURT

3  
4  
5  
6  
7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION

11  
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 AMIT M. EZYONI,  
16 ASAF NASS,  
17 a/k/a "Dan,"  
18 LIMOR GEFEN,  
19 a/k/a "Dana,"  
20 ELI KAUPP,  
21 DANIEL G. RANGEL,  
22 BARAK BRAUNSHAIN,  
23 RANDY W. GOLDBERG,  
24 BRANDI C. AYCOCK,  
25 DAVID R. LAMONDIN,  
26 MATTHEW D. SANDOMIR,  
27 STUART H. SHEINFELD,  
28 CAROL HAEUSSLER,  
CHRISTOPHER A. SARIOL, and  
EDUARDO A. SUBIRATS,

Defendants.

CR 07 00788 JFV

VIOLATIONS: 18 U.S.C. § 371 --  
Conspiracy; 18 U.S.C. § 1343 -- Wire  
Fraud; 18 U.S.C. § 1951 -- Extortion; 18  
U.S.C. § 1956(h) -- Conspiracy to Commit  
Money Laundering; 18 U.S.C. §  
1956(a)(1)(A)(I) -- Money Laundering; 18  
U.S.C. § 2 -- Aiding and Abetting and  
Willfully Causing; 18 U.S.C. § 982 --  
Criminal Forfeiture

SAN JOSE VENUE

INDICTMENT

INDICTMENT

The Grand Jury charges:

Introductory Allegations

At all times relevant to this Indictment:

1. AY Transport, Inc. ("AY"), also known as ("a/k/a") Progressive Van Lines ("PVL"), a/k/a Midwest Relocation Services, was a moving company with offices in San Jose, California, engaged in the interstate transportation of household goods ("goods") for members of the public.

2. National Moving Network ("NMN"), a/k/a Patriot Moving, a/k/a Premium Relocation Services, was a moving company with offices in Miami, Florida, engaged in brokering the interstate transportation of goods for members of the public.

3. Defendant Amit M. Ezyoni was the owner and chief executive officer of AY. As owner and CEO, defendant Ezyoni ran the day-to-day operations of AY.

4. Defendant Asaf Nass, a/k/a "Dan," was the operations manager of AY. As operations manager, defendant Nass assisted in running the day-to-day operations of AY.

5. Defendant Ezyoni had signatory authority over the primary AY business account, Wells Fargo Bank Account #009-1460212. Defendants Ezyoni and Nass had signatory authority over the primary PVL business account, Bank of America Account #12624-06932.

6. Defendant Limor Gefen, a/k/a "Dana," was the office manager of AY. As office manager, defendant Gefen handled customer complaints and assisted in the day-to-day operations of AY.

7. Defendant Eli Kaupp was a driver for AY. As a driver, defendant Kaupp participated in the loading and delivery of customers' goods and interacted directly with customers.

8. Defendant Daniel G. Rangel was a driver for AY. As a driver, defendant Rangel participated in the loading and delivery of customers' goods and interacted directly with customers.

9. Defendant Barak Braunshtain was a driver for AY. As a driver, defendant Braunshtain participated in the actual loading and delivery of customers' goods and interacted directly with

1 customers.

2 10. Defendant Randy W. Goldberg was the owner and president of NMN. As owner and  
3 president, defendant Goldberg ran the day-to-day operations of NMN.

4 11. Defendant Brandi C. Aycock was the sales manager for NMN. As sales manager,  
5 defendant Aycock supervised sales representatives in their assigned tasks of soliciting customers,  
6 taking customer inventories, providing customers with weight and price estimates, collecting  
7 customer deposits, and scheduling dates for the loading of customer goods.

8 12. Defendant David R. Lamondin was a sales representative for NMN. As a sales  
9 representative, defendant Lamondin solicited customers, took customer inventories, provided  
10 customers with weight and price estimates, collected customer deposits, and scheduled dates for  
11 the loading of customer goods.

12 13. Defendant Matthew D. Sandomir was a sales representative for NMN. As a sales  
13 representative, defendant Sandomir solicited customers, took customer inventories, provided  
14 customers with weight and price estimates, collected customer deposits, and scheduled dates for  
15 the loading of customer goods.

16 14. Defendant Stuart H. Sheinfeld was a sales representative for NMN. As a sales  
17 representative, defendant Sheinfeld solicited customers, took customer inventories, provided  
18 customers with weight and price estimates, collected customer deposits, and scheduled dates for  
19 the loading of customer goods.

20 15. Defendant Carol Haeussler was a sales representative for NMN. As a sales  
21 representative, defendant Haeussler solicited customers, took customer inventories, provided  
22 customers with weight and price estimates, collected customer deposits, and scheduled dates for  
23 the loading of customer goods.

24 16. Defendant Christopher A. Sariol was a sales representative for NMN. As a sales  
25 representative, defendant Sariol solicited customers, took customer inventories, provided  
26 customers with weight and price estimates, collected customer deposits, and scheduled dates for  
27 the loading of customer goods.

28 17. Defendant Eduardo A. Subirats was a sales representative for NMN. As a sales

representative, defendant Subirats solicited customers, took customer inventories, provided customers with weight and price estimates, collected customer deposits, and scheduled dates for the loading of customer goods.

COUNT ONE: (18 U.S.C. § 371-Conspiracy)

18. Paragraphs 1 through 17 of the Introductory Allegations section are realleged and incorporated as though fully set forth herein.

19. From in or around April 2001 and continuing through approximately October 2005, in Santa Clara County, in the Northern District of California, and elsewhere, the defendants

AMIT M. EZYONI,  
 ASAF NASS,  
 a/k/a "Dan,"  
 LIMOR GEFEN,  
 a/k/a "Dana,"  
 ELI KAUPP,  
 DANIEL G. RANGEL,  
 BARAK BRAUNSHAIN,  
 RANDY W. GOLDBERG,  
 BRANDI C. AYCOCK,  
 DAVID R. LAMONDIN,  
 MATTHEW D. SANDOMIR,  
 STUART H. SHEINFELD,  
 CAROL HAEUSSLER,  
 CHRISTOPHER A. SARIOL, and  
 EDUARDO A. SUBIRATS,

did knowingly and intentionally conspire to commit acts and offenses against the laws of the United States, that is: wire fraud, in violation of 18 U.S.C. § 1343; and extortion, in violation of 18 U.S.C. § 1951.

OBJECT OF THE CONSPIRACY

20. It was the object of the conspiracy for the defendants to unjustly enrich themselves by luring customers into doing business with NMN by offering them extremely low moving estimates, taking possession of customers' property and then subsequently increasing the price of AY's transport of the customers' goods, and thereafter withholding delivery of their goods until the customers paid the fraudulently inflated price to AY.

MANNER AND MEANS OF THE CONSPIRACY

21. Defendant NMN represented itself to the public as a reputable broker of interstate moves.

1           22. Defendant AY represented itself to the public as a reputable moving company.

2           23. At the direction of defendants Randy W. Goldberg and Brandi C. Aycock, defendants  
3 David R. Lamondin, Matthew D. Sandomir, Stuart H. Sheinfeld, Carol Haeussler, Christopher A.  
4 Sariol, Eduardo A. Subirats, and other NMN employees provided extremely low moving  
5 estimates to customers to induce them to hire NMN to move their goods. These estimates were  
6 conveyed by telephone, facsimile, and electronic mail ("e-mail"). Once NMN had secured the  
7 customer's contract, they collected a deposit and referred the deal without the customers'  
8 knowledge to AY. AY then provided the drivers and trucks to complete the move.

9           24. Defendants Amit M. Ezyoni, Asaf Nass, Limor Gefen supervised the AY drivers  
10 assigned to handle the moves, including defendants Eli Kaupp, Daniel G. Rangel, and Barak  
11 Braunshtain, among other AY drivers. The drivers typically rushed customers through the AY  
12 paperwork, causing them to sign blank or incomplete bills of lading and other documents, and  
13 failed to inform them of the actual price of the move prior to loading customer goods.

14           25. Once a customer's goods had been loaded, an AY employee would and did inflate the  
15 total price of the move by claiming that the customer's goods weighed more than had been  
16 originally estimated by NMN, or by overcharging the customer for packing materials.

17           26. When contacted by customers requesting the delivery of their goods, defendants  
18 Amit M. Ezyoni, Asaf Nass, Limor Gefen, and other AY employees demanded full payment of  
19 the new, inflated price before AY would deliver the goods. This new, inflated price was often  
20 multiple times the initial estimate provided to the customer by NMN.

21           27. Defendants Amit M. Ezyoni, Asaf Nass, Limor Gefen, and other AY employees  
22 ignored customers' repeated complaints about the inflated prices.

23           28. When customers refused to pay the inflated price, defendants Amit M. Ezyoni, Asaf  
24 Nass, Limor Gefen, and other AY employees arranged to warehouse customer goods, often under  
25 the names of individual drivers, and refused to divulge the location of the goods to customers.

26           29. When delivering customer goods, the drivers, acting under the direction of  
27 defendants Amit M. Ezyoni, Asaf Nass, Limor Gefen, and other AY employees, demanded that  
28 customers pay any outstanding balance before they would unload, or even provide access to, the



1 customer's goods.

2 30. Defendants Amit M. Ezyoni, Asaf Nass, Limor Gefen, and other AY employees  
3 refused to adequately compensate customers for any damaged or undelivered goods.

4 31. The extremely low bid price, the referral to AY, the drivers' rushing customers  
5 through paperwork, the increase in price after taking possession of customers' goods, and the  
6 refusal to release said goods unless the customers paid the increased price were all co-ordinated  
7 parts of the conspiracy designed to work together to extort maximum money from the customers.

8 OVERT ACTS

9 32. In furtherance of the conspiracy and to effect its objects, at least one of the co-  
10 conspirators committed at least one of the following overt acts, in the Northern District of  
11 California and elsewhere:

12 Victim 1: A.B. and K.S.

13 33. On or about July 26, 2002, in a telephone conversation between Colorado and San  
14 Jose, California, defendant Amit M. Ezyoni told A.B., an AY customer moving from San Jose,  
15 California to Colorado, that A.B.'s goods would not be delivered unless he paid AY a price  
16 which had been inflated from the original price estimate provided by NMN.

17 34. On or about July 27, 2002, defendant Daniel G. Rangel refused to unload A.B. and  
18 K.S.'s goods until K.S. paid him the inflated price.

19 Victim 2: S.M. and N.G.

20 35. On or about March 7, 2003, defendant David R. Lamondin mailed N.G. an estimate  
21 of \$2,880 to move N.G.'s and S.M.'s goods from Colorado to Florida.

22 36. On or about May 1, 2003, defendant Asaf Nass faxed N.G. a letter from San Jose,  
23 California to Florida informing N.G. that she was required to wire \$1,500 for the delivery to  
24 proceed, informing her that the price had increased from the original price estimate, and stating  
25 that full payment of the inflated price was required for the delivery to proceed.

26 37. On or about May 1, 2003, defendant Asaf Nass, speaking in a telephone call from  
27 San Jose, California, told an undercover agent posing as N.G. in a telephone call that she would  
28 not receive her belongings unless she paid the full inflated price.

1        Victim 3: T.M.

2        38. On or about May 15, 2003, defendant Asaf Nass informed T.M. in a telephone call  
3 from San Jose, California to Alabama that the cost of his move had been inflated to \$1,599, and  
4 that T.M.'s goods would not be delivered until the additional fees were paid.

5        39. On or about June 9, 2003, defendant Asaf Nass faxed T.M. from San Jose, California  
6 to Alabama a request that T.M. wire \$1,199 to AY's business bank account in San Jose,  
7 California as partial payment of the inflated price.

8        40. On or about June 18, 2003, defendant Asaf Nass informed T.M. in a telephone call  
9 between Alabama and San Jose, California that T.M. would not receive his goods until he had  
10 paid the full inflated price.

11       41. On or about July 7, 2003, defendant Eli Kaupp refused to unload T.M.'s goods unless  
12 T.M. paid the balance that AY claimed it was owed.

13       Victim 4: R.L.

14       42. On or about September 23, 2003, defendant Matthew D. Sandomir transmitted to  
15 R.L. in Florida an estimate of \$1,200 to move her goods from Florida to Tennessee.

16       43. On or about October 19, 2003, defendant Asaf Nass telephoned R.L. from San Jose,  
17 California to her location in Tennessee and told her that AY would not deliver her goods unless  
18 she paid the inflated price.

19       Victim 5: L.R.

20       44. On or about October 20, 2003, defendant Carol Haeussler transmitted to L.R. in  
21 California an estimate of \$2,378 to move his goods from California to Illinois.

22       45. On or about November 3, 2003, in a telephone call between San Jose, California and  
23 Illinois, defendant Limor Gefen, a/k/a/ "Dana," informed L.R. that he would not get his goods  
24 until he had paid the full amount of the inflated AY price for the move.

25       46. On or about November 3, 2003, in a telephone call between San Jose, California and  
26 Illinois, defendant Asaf Nass informed L.R. that he would not get his goods until he had paid the  
27 full amount of the inflated AY price for the move.

28       47. On or about December 15, 2003, defendant Asaf Nass faxed from San Jose,

1 California to L.R. in Illinois a settlement agreement with respect to the inflated price.

2 Victim 6: C.M.

3 48. On or about November 18, 2003, defendant Christopher A. Sariol transmitted to  
4 C.M. in Florida an estimate of \$1,446.50 to move C.M.'s goods from Florida to Minnesota.

5 49. On or about December 3, 2003, defendant Barak Braunshtain informed C.M, after his  
6 goods had been loaded, that the cost of the move had been inflated to \$2,401, and that C.M.  
7 would have to pay this full amount prior to receiving delivery of his goods.

8 50. On or about December 10, 2003, defendant Asaf Nass, speaking from San Jose,  
9 California, informed C.M. in a that he would not receive his goods until he paid the full inflated  
10 price.

11 Victim 7: L.G.

12 51. On or about January 20, 2004, defendant Eduardo A. Subirats e-mailed L.G. from  
13 Florida to Aptos, California an estimate of \$2,715 to move L.G.'s goods from Aptos, California  
14 to North Carolina.

15 Victim 8: A.G.

16 52. On or about April 23, 2004, in a telephone call from Florida to Massachusetts,  
17 defendant Stuart Sheinfeld provided A.G. with an estimate of \$1,855 to move A.G.'s goods from  
18 Massachusetts to Florida.

19 53. On or about June 19, 2004, defendant Barak Braunshtain informed A.G. in a  
20 telephone call that the cost of the move had increased to ~~\$2,944~~ and that he would not deliver  
21 her goods until she paid the full inflated price. *2,418.80 (RSD)*

22 54. On or about June 19, 2004, in a telephone call from Florida to San Jose, California,  
23 defendant Limor Gefen informed A.G. that Progressive Van Lines would not deliver her goods  
24 unless she paid the full inflated price.

25 Victim 9: T.P.

26 55. On or about June 28, 2004, in a telephone call between Louisiana and San Jose,  
27 California, defendant Asaf Nass informed customer T.P. that his goods would not be delivered to  
28 him unless he paid the full amount of a price inflated from the original quote provided by NMN.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH FIFTEEN: (18 U.S.C. §§ 1343 and 2-- Wire Fraud;  
Aiding and Abetting)

56. Paragraphs 1 through 17 of the Introductory Allegations section and paragraphs 20 through 31 of Count One are realleged and incorporated as though fully set forth herein.

SCHEME AND ARTIFICE

57. It was the object of the scheme and artifice for the defendants to unjustly enrich themselves by luring customers into doing business with NMN by offering them extremely low moving estimates, taking possession of customers' property and then subsequently increasing the price of AY's transport of the customers' goods, and thereafter withholding delivery of their goods until the customers paid the fraudulently inflated price to AY.

USE OF THE WIRES

58. On or about the dates listed in the separate counts below, in Santa Clara County, in the Northern District of California and elsewhere, the defendants, as listed below as to each count, for the purpose of executing and attempting to execute the scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly transmit and cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, signals and sounds, as more specifically described below:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>	<u>DESCRIPTION OF WIRE COMMUNICATION</u>
2	5/1/03	AMIT M. EZYONI ASAF NASS	Fax from Asaf Nass in California to N.G. in Florida regarding the inflated price of the move and requirement of full payment prior to delivery of goods
3	5/2/03	AMIT M. EZYONI ASAF NASS	Electronic wire transfer of \$1,500 sent from N.G. in Florida to AY in California at direction of Asaf Nass
4	6/9/03	AMIT M. EZYONI ASAF NASS	Fax from Asaf Nass in California to T.M. in Alabama requesting that T.M. wire an additional \$1,199 to AY

1	5	6/18/03	AMIT M. EZYONI ASAF NASS	Telephone call from T.M. in Alabama to Asaf Nass in California regarding the inflated price of the move and requirement of full payment prior to delivery of goods
2				
3				
4	6	10/19/03	AMIT M. EZYONI ASAF NASS	Telephone call from Asaf Nass in California to R.L. in Tennessee regarding the inflated price of the move and requirement of full payment prior to delivery of goods
5				
6				
7				
8	7	10/30/03	RANDY W. GOLDBERG CAROL HAEUSSLER	Fax from NMN in Florida to AY in California conveying estimate for move of L.R.
9				
10	8	11/3/03	AMIT M. EZYONI LIMOR GEFEN	Telephone call from L.R. in Illinois to Limor Gefen in California regarding the inflated price of the move and requirement of full payment prior to delivery of goods
11				
12				
13				
14	9	11/3/03	AMIT M. EZYONI ASAF NASS	Telephone call from L.R. in Illinois to Asaf Nass in California regarding the inflated price of the move and requirement of full payment prior to delivery of goods
15				
16				
17	10	12/15/03	AMIT M. EZYONI ASAF NASS	Fax from Asaf Nass in California to L.R. in Illinois outlining terms of settlement agreement between AY and L.R. regarding inflated price
18				
19				
20	11	12/16/03	AMIT M. EZYONI ASAF NASS	Fax from L.R. in Illinois to Asaf Nass in California signing settlement agreement between AY and L.R. regarding inflated price
21				
22	12	1/20/04	RANDY W. GOLDBERG EDUARDO A. SUBIRATS	E-mail from NMN in Florida to L.G. in California conveying estimate for L.G.'s move from California to North Carolina
23				
24				
25	13	6/19/04	AMIT M. EZYONI LIMOR GEFEN	Telephone call from A.G. in Florida to Limor Gefen in California regarding the inflated price of the move and requirement of full payment prior to delivery of goods
26				
27				
28				

14	6/19/04	AMIT M. EZYONI LIMOR GEFEN	Electronic wire transfer of \$1,028 sent from A.G. in Florida to AY in California at direction of Limor Gefen
----	---------	-------------------------------	---

15	6/28/04	AMIT M. EZYONI ASAF NASS	Telephone call from T.P. in Louisiana to Asaf Nass in California regarding the inflated price of the move and requirement of full payment prior to delivery of goods
----	---------	-----------------------------	--

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS SIXTEEN THROUGH TWENTY-THREE: (18 U.S.C. §§ 1951 and 2- Extortion; Aiding and Abetting)

59. Paragraphs 1 through 17 of the Introductory Allegations section and paragraphs 20 through 31 of Count One are realleged and incorporated as though fully set forth herein.

60. On the dates set forth in the separate counts below, in the Northern District of California, and elsewhere, the defendants did knowingly, willfully, and unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect interstate commerce by means of extortion by demanding and receiving money for moving services from customers, said customers' consent having been induced by the defendants' wrongful use of fear of economic harm, in that, defendants threatened to withhold delivery of customers' goods unless they paid the money that the defendants demanded.

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>VICTIM(S)</u>
16	3/7/03-5/11/03	RANDY W. GOLDBERG DAVID R. LAMONDIN AMIT M. EZYONI ASAF NASS	S.M. and N.G.
17	4/30/03-7/7/03	RANDY W. GOLDBERG AMIT M. EZYONI ASAF NASS ELI KAUPP	T.M.
18	9/23/03-11/28/03	RANDY W. GOLDBERG MATTHEW D. SANDOMIR AMIT M. EZYONI ASAF NASS	R.L.

1	19	10/20/03–12/16/03	RANDY W. GOLDBERG CAROL HAEUSSLER AMIT M. EZYONI ASAF NASS LIMOR GEFEN	L.R.
2				
3				
4	20	11/18/03–12/20/03	RANDY W. GOLDBERG CHRISTOPHER A. SARIOL AMIT M. EZYONI ASAF NASS BARAK BRAUNSHAIN	C.M.
5				
6				
7	21	1/20/04–3/10/04	RANDY W. GOLDBERG EDUARDO A. SUBIRATS	L.G.
8				
9	22	4/23/04–6/22/04	RANDY W. GOLDBERG STUART H. SHEINFELD AMIT M. EZYONI LIMOR GEFEN BARAK BRAUNSHAIN	A.G.
10				
11				
12	23	5/5/04–8/6/04	RANDY W. GOLDBERG AMIT M. EZYONI ASAF NASS	T.P.
13				

14 All in violation of Title 18, United States Code, Sections 1951 and 2.

15 COUNT TWENTY-FOUR: (18 U.S.C. § 1956(h) – Conspiracy to Launder Monetary  
16 Instruments)

17 61. Paragraphs 1 through 17 of the Introductory Allegations section, paragraphs 20  
18 through 31 of Count One, and the factual allegations contained in Counts Two through Twenty-  
19 Three are realleged and incorporated as though fully set forth herein.

20 62. From in or around April 2001 and continuing through approximately October 2005,  
21 in Santa Clara County, in the Northern District of California, and elsewhere, the defendants

22 AMIT M. EZYONI,  
23 ASAF NASS, and  
24 RANDY W. GOLDBERG

25 did knowingly conspire to conduct financial transactions affecting interstate commerce which in  
26 fact involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of Title  
27 18, United States Code, Section 1343, and extortion, in violation of Title 18, United States Code,  
28 Section 1951, with the intent to promote that specific unlawful activity; in violation of Title 18,  
United States Code, Sections 1956(h) and 1956(a)(1)(A)(I).



COUNTS TWENTY-FIVE THROUGH TWENTY-EIGHT: (18 U.S.C. § 1956(a)(1)(A)(I) – Money Laundering)

63. Paragraphs 1 through 17 of the Introductory Allegations section, paragraphs 20 through 31 of Count One, the factual allegations contained in Counts Two through Twenty-Three, and paragraph 3 of Count 24 are realleged and incorporated as though fully set forth herein.

64. On or about the dates indicated for each Count below, in Santa Clara County, in the Northern District of California, and elsewhere, the defendants, as listed below as to each count, did knowingly conduct financial transactions affecting interstate commerce, to wit: the deposit of monies into the AY business account, and the use of those funds to pay NMN and Randy Goldberg, which involved the proceeds of a specified unlawful activity, that is, wire fraud and extortion, as set forth in Counts Two through Twenty-Three, with the intent of promoting the specified unlawful activity, to wit: wire fraud and extortion, as set forth in Counts Two through Twenty-Three, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transaction, that is the deposits and checks summarized as follows, represented the proceeds of some form of unlawful activity:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>	<u>FINANCIAL TRANSACTION</u>
25	5/2/03	ASAF NASS	\$1,500 wire transfer transmitted to AY from N.G. into AY business account Wells Fargo Acct #009-1460212
26	7/15/03	AMIT M. EZYONI	\$13,727.62 check payable to National Moving Network from AY business account Wells Fargo Acct #009-1460212
27	12/23/03	AMIT M. EZYONI	\$14,803.05 deposit into AY business account Wells Fargo Acct #009-1460212
28	1/9/04	AMIT M. EZYONI	\$34,640 check payable to Randy Goldberg from AY Business account Wells Fargo Acct #009-1460212

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(I).

1 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461(c) -  
 2 Forfeiture Of Wire Fraud and Extortion Proceeds)

3 65. The factual allegations contained in paragraphs 1-17 of the Introductory Allegations  
 4 and Counts One through Twenty-Four of this Indictment are realleged and by this reference fully  
 5 incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18,  
 6 United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c).

7 66. Upon a conviction of any of the offenses alleged in Counts One through Twenty-  
 8 Four, the defendants,

9 AMIT M. EZYONI,  
 10 ASAF NASS,  
 11 a/k/a "Dan,"  
 12 LIMOR GEFEN,  
 13 a/k/a "Dana,"  
 14 ELI KAUPP,  
 15 DANIEL G. RANGEL,  
 16 BARAK BRAUNSHAIN,  
 17 RANDY W. GOLDBERG,  
 18 BRANDI C. AYCOCK,  
 19 DAVID R. LAMONDIN,  
 20 MATTHEW D. SANDOMIR,  
 21 STUART H. SHEINFELD,  
 22 CAROL HAEUSSLER,  
 23 CHRISTOPHER A. SARIOL, and  
 24 EDUARDO A. SUBIRATS,

25 shall forfeit to the United States all property, real or personal, which constitutes and is derived  
 26 from proceeds traceable to said offenses.

27 3. If, as a result of any act or omission of the defendants, any of said property

- 28 a. cannot be located upon the exercise of due diligence;
- 29 b. has been transferred or sold to or deposited with, a third person;
- 30 c. has been placed beyond the jurisdiction of the Court;
- 31 d. has been substantially diminished in value; or
- 32 e. has been commingled with other property which cannot be divided without  
 33 difficulty;

any and all interest defendants have in any other property, up to value of the property described in paragraph 2 above, shall be forfeited to the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by as incorporated by Title 28, United States Code, Section 2461(c) and Rule 32.2 of the Federal Rules of Criminal Procedure.

DATED: 12/12/07

A TRUE BILL.

FOREPERSON

SCOTT N. SCHOOLS  
United States Attorney

MATTHEW A. PARRELLA  
Chief, San Jose Branch Office

(Approved as to form:

AUSA NEDROW

UNITED STATES DISTRICT COURT

08-6014-LSS

SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

Plaintiff

vs.

Randy W. Goldberg

Defendant

CASE NUMBER: CR 07-00788-07-JF

USMS # 77541-004

REPORT COMMENCING  
CRIMINAL ACTION

TO: CLERK'S OFFICE, MIAMI / FT. LAUDERDALE / W. PALM BEACH  
U.S. DISTRICT COURT

NOTE: CIRCLE APPROPRIATE LOCATION FOR APPEARANCE IN  
MAGISTRATES COURT ABOVE

COMPLETE ALL ITEMS. IF INFORMATION NOT APPLICABLE, ENTER N/A

DATE AND TIME OF ARREST: 1/17/08 AM/PM

LANGUAGE(S) SPOKEN: English + French

OFFENSE(S) CHARGED: 18 USC 371, 18 USC 1343, 18 USC 1951  
18 USC 1956(h) Conspiracy, Wire Fraud,  
Extortion, Money Laundering

UNITED STATES CITIZEN: ( ) YES ☒ NO ( ) UNKNOWN

DATE OF BIRTH: 02/05/70

TYPE OF CHARGING DOCUMENT: (CHECK ONE)

☒ INDICTMENT ( ) COMPLAINT CASE #

( ) BENCH WARRANT FOR FAILURE TO APPEAR

( ) PAROLE VIOLATION WARRANT

FBI SA, Bill Schureck Co 954-553-9245

SCANNED